

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-mj-02792-Louis

UNITED STATES OF AMERICA

vs.

RALPH KEVIN TOVAR,

Defendant.

_____ /

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)? No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No
3. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No

Respectfully submitted,
JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

BY:



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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

RALPH KEVIN TOVAR,

Case No. 22-mj-02792-Louis

*Defendant(s)***CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 6, 2022 in the county of Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

*Code Section**Offense Description*18 U.S.C. § 1591(a)(1), (b)(1), and
1594(a)

Attempted Sex Trafficking of a Minor

18 U.S.C. § 2422(b)

Attempted Coercion and Enticement of a Minor to Engage in Sexual Activity

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.*Complainant's signature*

Krystian Locurto, Special Agent; HSI

*Printed name and title*Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by FaceTimeDate: 05/07/2022*Judge's signature*City and state: Miami, Florida

Honorable Lauren F. Louis, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Krystian Locurto, having been duly sworn, hereby depose and state:

AGENT BACKGROUND

1. I am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”), and have been so employed since January 2018. Thus, I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code. That is, I am an officer of the United States who is empowered by law to conduct investigations of, and make arrests for, violations of federal law, including the offenses enumerated in Title 18, United States Code, Sections 1589, 1029, 1028A and 1951.

2. I currently serve as part of the Human Trafficking Group and the South Florida Human Trafficking Task Force in the Special Agent in Charge (SAC) Miami Office. My duties include the investigation of crimes involving sex trafficking and labor trafficking. I have received training on the proper investigative techniques for these violations, including the use of surveillance techniques, undercover activities, and the application and execution of arrest and search warrants. I have conducted and assisted in several human trafficking investigations, and have executed search warrants that have led to seizures of critical evidence

3. This Affidavit is submitted in support of a criminal complaint charging Ralph Kevin TOVAR with attempted sex trafficking of a minor, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and 1594(a); and attempted coercion and enticement of a minor to engage in sexual activity, in violation of Title 18, United States Code, Section 2422(b).

4. As explained below, there is probable cause to believe that, on or about May 6, 2022, in Miami-Dade County, in the Southern District of Florida, TOVAR did knowingly attempt

to, in and affecting interstate and foreign commerce, entice, obtain, solicit, and patronize by any means a person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

5. There is also probable cause to believe that, on or about May 6, 2022, in Miami-Dade County, in the Southern District of Florida, TOVAR, using a facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense.

6. This Affidavit is based on my personal investigation and investigation by others, including federal and local law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by interviewing witnesses and examining documents obtained in the course of the investigation as well as through other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

FACTUAL BACKGROUND

7. Beginning on or about May 6, 2022, law enforcement posted an advertisement (the “Advertisement”) on a website commonly used to advertise prostitution services that contained images of what appeared to depict two young females and the following language:

“[fire emoji] [fire emoji] 2 girls cum in hot [fire emoji] [fire emoji] In Miami ready for fun times!!!! [water emoji] [kiss face emoji] two beautiful girls cum in hot [fire emoji] [fire emoji] Fresh and ready to give a unique and one of a kind experience [peach emoji] [water emoji] TEXT FOR DETAILS”

8. The Advertisement listed the age as 21 years old¹ and contained a contact phone

¹ The website utilized by law enforcement requires users to be at least 21 years old to utilize the website’s services.

number (the “Advertisement Number”) that was monitored by law enforcement and operated by an undercover officer (“UC 1”).

9. On or about May 6, 2022, the Advertisement Number received a text message from a phone number ending in 0089 (the “0089 Number”) in response to the Advertisement. Thereafter, a text conversation between UC 1 and the user of the 0089 Number ensued. UC 1 stated that they had two minor girls—ages 15 years old and 13 years old—available for various sex acts in exchange for money. The user of the 0089 Number agreed to pay \$400 to have sex with both the 15- and 13-year-old girls during an hourlong date:

Advertisement Number	ok babe, i hve 2 young beautiful grls available 2nite...one is 15 years old and the other is 13.
0089 Number	Ok how late are you available tonight? I wanna make an appointment
...	
Advertisement Number	2 girls for HR is \$400 papi...they will do everythin & anything...but the 13 year old doesn't do anal-is that ok???
0089 Number	I told not to talk about the service. This is business. Yea I'm ok and I could pay more as well.
Advertisement Number	Ok babe so u wnt 2 come 2nite?
0089 Number	Yes
Advertisement Number	Ok luv, 1 HR/2 GRLS at 11?
0089 Number	Yes
Advertisement Number	ok luv. Do me a fav n let me know wen ur ready 2 go so I cn mke sure the grls r showered n ready 4 u :)
0089 Number	Ok if possible I might text from different number because you kind messed up by texting about anal. This is very confidential because of their age already.

10. Later in the same conversation, UC 1 and the 0089 Number discussed pricing for the additional services, and the user of the 0089 Number indicated he would bring additional cash for anal sex, sex without a condom, and photographs of the minor girls. UC 1 and TOVAR agreed on a price of \$550 in exchange for the hourlong date with the two girls, the anal sex, the sex with

no condom, and photos of the girls. The user of the 0089 Number then stated “9548661827 is the number that I’m gonna text you” (the “1827 Number”).

11. The Advertisement Number then received several messages from the 1827 Number, where the 1827 Number stated “this is my new number” and that he was “looking forward for later appointment.”

1827 Number	Hi this is my new number
1827 Number	I’m looking forward for later appointment
...	
1827 Number	It is possible to change the appointment to later time. I’m not sure if I’m honna make it to 11 exactly if it is ok?
Advertisement Number	wut time r u wntin 2 come,,??
1827 Number	Like Iam, you know just in case people don’t see me

12. Thereafter, UC 1 provided the user of the 1827 Number with the address of a hotel in Doral, Florida (“Hotel”) as the location of the date with the 15- and 13-year-old girls.

13. Shortly thereafter, TOVAR arrived at the Hotel. An undercover officer (“UC 2”) posing as the user of the Advertisement Number was present at the Hotel parking lot. TOVAR approached UC 2 and provided her with the \$550 he agreed to pay for the commercial sex with the 15- and 13-year-old girls.

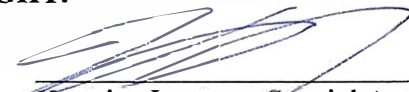
14. Following the exchange of the cash, law enforcement arrested TOVAR and took him into custody.

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CONCLUSION

15. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging Ralph Kevin TOVAR with attempted sex trafficking of a minor, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and 1594(a); and attempted coercion and enticement of a minor to engage in sexual activity, in violation of Title 18, United States Code, Section 2422(b).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Krystian Locurto, Special Agent
Homeland Security Investigations

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by FaceTime, on this 7 __ day of May, 2022,
at Miami, Florida.



HONORABLE LAUREN F. LOUIS
UNITED STATES MAGISTRATE JUDGE